

From: [Kopf, Jeff](#)
To: [PAUL DEMEO](#)
Cc: [Tougas, Stephanie](#)
Subject: RE: Gardner Sludge Landfill Complaint Investigation and Progress
Date: Friday, June 26, 2020 2:17:48 PM

Mr. Demeo,

I contacted our permitting office and found out that the City, upon being informed of its need to apply for stormwater permit coverage did apply for a permit. On May 27th, the City applied for, and has received coverage under EPA's National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP).

As mentioned above, this is a General Permit, which means any eligible operator can submit a Notice of Intent (NOI) to be covered by the permit. Details related to the MSGP can be found here:

<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>

In particular, you may want to view Part 8, Subpart L, of the MSGP which contains the sector specific benchmark monitoring requirements and effluent limitations that apply to landfills covered by the permit.

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From: PAUL DEMEO <ryanrealty@comcast.net>
Sent: Saturday, June 20, 2020 4:19 PM
To: Kopf, Jeff <Kopf.Jeff@epa.gov>
Cc: Canzano, Joseph <canzano.joseph@epa.gov>; Handler, Neil <Handler.Neil@epa.gov>; Gray, Davidj <gray.davidj@epa.gov>; Chow, James <chow.james@epa.gov>; Jerison, Joanna <Jerison.Joanna@epa.gov>; Tougas, Stephanie <tougas.stephanie@epa.gov>; Alan <rousseaua@verizon.net>; matthewmarro@gmail.com; Andrew Fisk <afisk@ctriver.org>; Ivan Ussach (MRWC) <ivan@millersriver.net>; Jo-Anne Burdin <jo0@verizon.net>; spotlight@globe.com; Scott Graves <sgraveslawoffice37@gmail.com>; ryanrealty <ryanrealty@comcast.net>
Subject: Re: Gardner Sludge Landfill Complaint Investigation and Progress

Mr. Kopf,

It is apparent from the attached documents Gardner is not in compliance with the "Sludge Landfill" nor have they been in all the years of its existence.

Why hasn't the EPA fined Gardner and taken any sort of enforcement action?

Mr. Arnold did not tell the truth when he stated in the attached e-mail that Gardner accepts no "sewage" from surrounding communities. Gardner does in fact accept sewage from South Ashburnham and East Templeton.

Yes, the matter of Storm-Water run-off is a serious issue not knowing what is in the water flowing from the "Sludge Landfill".

This is not the first instance of Gardner failing to provide full information relative to Storm-Water run-off in their MSP-4 Permit.

As I stated in the previous e-mail, Gardner is in the process of expanding this "Sludge Landfill" with the Option of receiving "Sludge" from other communities.

Again, I am glad many officials from the EPA are taking a close look at Gardner because there are other issues that must be addressed for the Safety of the Public and Public Health.

Looking forward to your response.

Best Regards,
Paul DeMeo

On June 19, 2020 at 1:09 AM PAUL DEMEO <ryanrealty@comcast.net> wrote:

Mr. Kopf,

I am quite impressed with the EPA investigation of the complaint filed by Mr. Alan Rousseau and myself relative to storm-water discharge from the City of Gardner Sludge Landfill which is nearing capacity. (Gardner is seeking to expand the sludge landfill and the EPA needs to get involved to stop this) **Gardner would have the option to bring in sludge from other communities and is considering this as it's a "cash cow".**

The fact that the EPA has so many folks involved on this complaint leads me to believe there are some serious issues in Gardner which have been overlooked for quite some time. I am glad many people at the EPA are taking notice.

Keep in mind, Gardner was at one time the furniture capital of the world and at one time may have had as many as 30-35 furniture manufacturing companies who used many stains, laquers, and chemicals in those facilities. Gardner had Lilly Chemical which supplied many of the companies. Gardner had Simplex Time Recorder (Tyco) Collier Keyworth, Nichols and Stone, Conant Ball, Gem Industries, Kamman's, Heywood-Wakefield, Standard Chair, S. Bent, Florence Stove, Harrington and Richardson, Heywood Hospital, Van Huffel, and yes, Rousseau Brothers

among many other large and small companies.

The question was raised by some at the EPA whether or not Gardner is, or was an industrial community with discharges into the sewer system and waterways. Most certainly!

Industrial chemicals and waste were dumped by barrels at the now closed Gardner Landfill which was once a valley and is now a mountain. The dump used to catch fire from the chemicals. This pollution from the landfill destroyed a pond.

Parker's Pond receives storm-water drainage from Uptown Gardner and the sediment in the now filled pond, is thought to be highly polluted so much so that there is no consideration to dredge it because of the hazardous material! Cancer rates are very high in this section of Gardner. This is the same area as the landfills.

Gardner has old chemically treated railroad ties (tracks) adjacent to the City's Public Drinking Water supply which is eroding into Crystal Lake but nobody seems to care! I could go on and on about issues the EPA should be investigating in the City of Gardner.

Back to the complaint: It seems apparent that the City of Gardner is lacking a MSGP Permit? Am I correct? There is also a NPDES ID# MAR 041190 Pending? What is this?

How is it Gardner is allowed to operate a Sludge Landfill containing much hazardous waste with little oversight from the EPA?

The check-dams catching run-off from the elevated landfill have failed and were put in recently as an emergency measure because of the sand and silt and whatever else discharging into a wetland. Photos were submitted to Stephanie.

The "NEW" Wetland Delineation clearly shows the culvert empty's into the Wetland. Keep in mind, this eventually flows into the Connecticut River via Otter River and Miller's River. I don't believe Gardner has any storm-water discharge permit for this nor should they.

Mr. Rousseau asked that soil and water samples be taken. Nobody has responded to this. Test wells with water samples should also be taken.

Both Mr. Rousseau and myself asked that the EPA do a site visit to the sludge landfill but to our knowledge, this has not occurred.

Hi Stephanie,
I wanted to clarify my previous email. We have one Industrial user in the system and it as actually

the Leachate from the Landfill that falls under the Industrial Pretreatment Program.

We are going to look into why the Leachate was considered Industrial waste in the past.

Dane Arnold

How can this statement from Mr. Arnold be correct as we have many industrial users connected to the sewer system.

"Because the treatment plant accepts such discharges, it appears that the landfill that accepts sludge from the treatment plant would be required to apply for coverage under the federal Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activities."

Details on how to obtain coverage under the MSGP can be found here: <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>
You may contact Dave Gray in the Water Division of EPA Region 1 if you have further questions related to the MSGP application process at 617-918-1577 or at gray.davidj@epa.gov.

We urge you to look into this matter promptly.

Stephanie Tougas

It would appear the City of Gardner is not and has not been in compliance with EPA regulations and the current sludge landfill should be shut down and further expansion stopped.

It is quite concerning much of the information in the EPA e-mails has been "redacted". Where is the transparency of open government and the right of the public, to "Public Records"? **What is being kept hidden is cause for concern.**

Mr. Rousseau and I would like an update on the investigation as we have heard nothing in the past three weeks.

Thank you very much for your time and attention to this most important matter in protecting the environment.

Best Regards to All,
Paul DeMeo

